

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	Case No. 1:21-cr-00159-JPC
Plaintiff	)	
	)	Judge J. Philip Calabrese
v.	)	
	)	
RICHARD GOULD,	)	
	)	DEFENDANT'S MOTION FOR
Defendant	)	<u>CONTINUANCE OF STATUS CONFERENCE</u>

The undersigned, counsel for Defendant Richard Gould in the above-captioned case, hereby respectfully requests that the status conference scheduled in the above-captioned case on July 18, 2022, be rescheduled to another date because of a conflict in counsel's trial schedule. In support thereof, the Defendant states;

- 1.) By court order issued on April 29, 2022, a status conference scheduled for June 2, 2022, in this case was rescheduled for July 18, 2022, at 3:00 p.m.
- 2.) Defendant's counsel is scheduled for a two day trial in Geauga County Court of Common Pleas scheduled to begin on July 18, 2022, at 9:00 a.m.
- 3.) Because of the scheduled trial in Geauga Count Defendant's counsel will not be able to attend the status conference in this case currently scheduled for 3:00 p.m. on July 18, 2022.
- 4.) Assistant United States Attorney Brian McDonough has been contacted and has no objection to this motion for continuance.
- 5.) At this point in time the schedules for Defendant's counsel, the Defendant, and Assistant United States Attorney Brian McDonough are open for the entire week of July 25, 2022, as a possibility for rescheduling the status conference in this case.

WHEREFORE, it is prayed that this motion be granted and the status conference be rescheduled.

Respectfully submitted,

Carol A. Szczepanik

CAROL A. SZCZEPANIK (0025069)  
Law Office of Carol A. Szczepanik, LLC  
Counsel for Defendant  
P.O Box 214  
10808 Kinsman Road  
Newbury, Ohio 44065  
Tel. No.: 440-337-9930  
Fax No.: 440-337-9933  
cszczepanik@geaugalaw.com

**CERTIFICATE OF SERVICE**

A copy of this Motion for Continuance was sent to Assistant United States Attorney Brian McDonough on May 3, 2022, by e mail addressed to Brian.McDonough@usdoj.gov.

Carol A. Szczepanik

CAROL A. SZCZEPANIK (0025069)  
Attorney for Defendant